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*Attorneys for Tecumseh–Infinity Medical  
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**IN THE UNITED STATES BANKRUPTCY COURT  
 FOR THE DISTRICT OF NEVADA**

In re:  
 INFINITY CAPITAL MANAGEMENT, INC.  
 Debtor.

Case No. 21-14486-abl  
 Chapter 7

HASELECT-MEDICAL RECEIVABLES  
 LITIGATION FINANCE FUND  
 INTERNATIONAL SP,

Plaintiff,

v.

TECUMSEH-INFINITY MEDICAL  
 RECEIVABLES FUND, LP,

Defendant.

Adversary Case No. 21-01167-abl

**STIPULATION TO EXTEND  
 DISCOVERY DEADLINES AND  
 CONTINUE TRIAL DATE  
 (THIRD REQUEST)**

TECUMSEH-INFINITY MEDICAL  
RECEIVABLES FUND, LP,

Counter-Claimant,

v.

HASELECT-MEDICAL RECEIVABLES  
LITIGATION FINANCE FUND  
INTERNATIONAL SP,

Counter-Defendant.

HASELECT-MEDICAL RECEIVABLES  
LITIGATION FINANCE FUND  
INTERNATIONAL SP,

Counter-Claimant

v.

TECUMSEH-INFINITY MEDICAL  
RECEIVABLES FUND, LP,

Counter-Defendant.

**STIPULATION TO EXTEND DISCOVERY DEADLINES AND CONTINUE  
TRIAL DATE (THIRD REQUEST)**

Tecumseh-Infinity Medical Receivables Fund, LP ("Tecumseh"), by and through its undersigned counsel, and HASElect-Medical Receivables Litigation Finance Fund International SP ("HASElect"), by and through its undersigned counsel (each a "Party" and, collectively, the "Parties"), hereby agree and stipulate, pursuant to Local Rule 7026, to extend discovery deadlines and trial as follows:

**A. Discovery Completed**

The following discovery has been completed:

1. On or about January 12, 2022, HASElect served a subpoena on nonparty Three Bell Capital.
2. On or about January 12, 2022, HASElect served a subpoena on nonparty Jonathan

1 Porter.

2 3. On or about January 17, 2022, Tecumseh served its Initial Disclosures pursuant to  
3 FRCP 26 on HASelect.

4 4. On or about January 18, 2022, HASelect served its Initial Disclosures pursuant to  
5 FRCP 26 on Tecumseh.

6 5. On or about March 10, 2022, HASelect served its First Set of Interrogatories and  
7 Requests for Production on Tecumseh.

8 6. On or about March 29, 2022, Tecumseh served its First Set of Requests for  
9 Production on HASelect.

10 7. On or about April 18, 2022, Tecumseh served its Responses to HASelect's First Set  
11 of Interrogatories and Requests for Production.

12 8. On or about May 18, 2022, HASelect served its Responses to Tecumseh's First Set  
13 of Requests for Production.

14 9. On or about August 29, 2022, Tecumseh served its First Set of Interrogatories and  
15 Requests for Admission as well as its Second Set of Requests for Production on HASelect.

16 10. On or about September 9, 2022, HASelect served its deposition notice for the  
17 deposition of Tecumseh.

18 11. On or about September 9, 2022, HASelect served deposition subpoenas on various  
19 nonparties.

20 12. On or about September 28, 2022, HASelect served its Responses to Tecumseh's First  
21 Set of Interrogatories and Requests for Admission as well as its Second Set of Requests for  
22 Production on HASelect.

23 13. On or about November 28, 2022, Tecumseh served its Third Set of Requests for  
24 Production on HASelect.

25 14. On or about December 2, 2022, Tecumseh served its Subpoena to Produce  
26 Documents to GPMicro, Inc.

27 15. On or about December 28, 2022, HASelect served deposition subpoenas on various  
28 nonparties.

1           16. On or about January 5, 2023, Tecumseh served deposition subpoenas for HASelect  
2 and other various nonparties.

3 **B. Discovery Remaining**

4           Discovery in this case has been ongoing and additional discovery remains to be completed,  
5 including, but not limited to:

- 6           1. Depositions of each party or the party's representative(s);
- 7           2. Depositions of various third parties;
- 8           3. Responses to outstanding written discovery;
- 9           4. Supplementation of prior written discovery;
- 10          5. Meet and confer regarding allegedly deficient discovery responses; and
- 11          6. Possible motion practice regarding allegedly deficient discovery responses.

12          The Parties reserve their right to take additional depositions based on information disclosed  
13 in produced documents or obtained in the depositions the Parties have identified.

14 **C. Reasons Why Discovery Will Not Be Completed Within the Time Limit of the Existing**  
15 **Deadlines**

16          This case is complex and involves thousands of accounts receivable purchased from more  
17 than 100 different medical providers. While this Court has already ruled on some of the issues  
18 regarding a subset of the accounts receivable at issue, other accounts receivable remain that require  
19 further discovery and analysis. The Parties have worked diligently by engaging in discovery from  
20 the outset of this case, but the extent of the documents produced in this matter are voluminous and  
21 require additional time for review. Further, although depositions have been noticed, they will likely  
22 need to be pushed back to accommodate the Parties as well as non-party deponents' schedules and  
23 receipt of further discovery from third party subpoenas and party disclosures. There are also  
24 outstanding issues regarding allegedly deficient discovery responses that will require that the Parties  
25 meet and confer, which may also require motion practice.

26          The Parties believe that, given the situation as it presently exists, discovery cannot be  
27 accomplished by the represented deadlines in the Order Granting the Parties' Stipulation to Extend  
28

1 Discovery Deadlines (Second Request) on file herein [ECF No. 155]. This third stipulation to extend  
2 the existing discovery deadlines is brought in good faith and not for the purpose of delay. Based on  
3 the information presented in this Stipulation, the Parties believe that good cause exists to extend  
4 discovery as proposed in order to permit the Parties to ensure that discovery is conducted in a  
5 thorough manner and to continue trial.

6 **D. Proposed Agreement and Amended Discovery Schedule**

7 Based on the foregoing, the Parties stipulate and agree as follows, subject only to entry of  
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proposed order by this court approving this Stipulation, substantially in the form attached hereto as **Exhibit A**:

1. The Parties agree to extend the discovery deadlines as follows:

Event Deadline	Current Date	Proposed Date
Close of Fact Discovery	1/30/2023	3/30/2023
Dispositive Motion Deadline	3/2/2023	5/1/2023
Final List of Witnesses and Exhibits	3/16/2023	5/15/2023
Expected trial ready date	3/31/2023	5/30/2023

2. This matter is presently scheduled to go to trial beginning on April 3, 2023. The extension of discovery deadlines requested herein will require a continuance of this trial date.

**IT IS SO STIPULATED.**

GARMAN TURNER GORDON LLP

SHEA LARSEN

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# EXHIBIT A

# EXHIBIT A

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**ORDER GRANTING STIPULATION  
 TO EXTEND DISCOVERY  
 DEADLINES AND CONTINUE TRIAL  
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TECUMSEH-INFINITY MEDICAL  
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RECEIVABLES FUND, LP,

Counter-Defendant.

**ORDER GRANTING STIPULATION TO EXTEND DISCOVERY DEADLINES AND  
CONTINUE TRIAL DATE (THIRD REQUEST)**

The Court having considered the *Stipulation to Extend Discovery Deadlines and Trial  
Readiness Date (Third Request)* (“**Stipulation**”),<sup>1</sup> by and between Tecumseh-Infinity Medical  
Receivables Fund, LP (“Tecumseh”), by and through its undersigned counsel, and HASElect-  
Medical Receivables Litigation Finance Fund International SP (“HASElect”), by and through its  
undersigned counsel, and finds that good cause exists to grant the relief requested. Accordingly:

...

...

<sup>1</sup> Any capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Stipulation.

**IT IS ORDERED** that the Stipulation is approved in its entirety.

**IT IS FURTHER ORDERED** that the discovery deadlines are extend as follows:

Event Deadline	Current Date	Proposed Date
Close of Fact Discovery	1/30/2023	3/30/2023
Dispositive Motion Deadline	3/2/2023	5/1/2023
Final List of Witnesses and Exhibits	3/16/2023	5/15/2023
Expected trial ready date	3/31/2023	5/30/2023

**IT IS FURTHER ORDERED** that the extension of discovery deadlines requested herein will require a continuance of this trial date, and, therefore, this matter shall begin trial beginning on May 30, 2023.

**IT IS SO ORDERED.**

Prepared by:

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By: /s/ Jared Sechrist

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